

# Exhibit 6

**Lauren Capurro (Russell)**

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**From:** Lauren Capurro (Russell) <LaurenRussell@tatp.com>  
**Sent:** Saturday, January 09, 2016 9:47 AM  
**To:** 'MARTIN QUINN'  
**Cc:** 'Marlo Cohen'; 'Sandra Chan'; 'Mario Alioto'; lauren russell@tatp.com  
**Subject:** RE: CRT/Expense Audit Report

The email below is set on behalf of Mario N. Alioto:

Dear Special Master Quinn:

I have spoken to the expense audit committee and am responding to your email of yesterday morning.

I do not believe the audit should be made public. It makes no difference that it will be on Case Anywhere. It will be made available to adverse parties and ultimately will become a part of the Court record. Moreover, I cannot authorize it be made public or placed on Case Anywhere. This audit was done to assist the Special Master, not to be filed in the public record or Case Anywhere. Below are a few reasons for my decision.

1. Your November 28, 2015 Order regarding the production of time and expense records denied the objectors access to IPP Counsel's expense records, and held that your review would be sufficient. No additional showing has been made by objectors to justify giving them access to these materials now.
2. It would be unprecedented for class counsel's expense records and backup material to be made available for public review. In class actions, expense records are exclusively made available to the judge for *in camera* review. In fact, Judge Tigar performed such a limited *in camera* review in the DPP case. The submissions include backup as well as our work product, not intended for review by adverse parties.
3. While collecting materials for this extended audit, all IPP Counsel were informed that the expense submissions would only be seen by my firm, the expense audit committee and you. It was never indicated that their receipts, bank statements and other backup documentation would be made public. Therefore, IPP Counsel did not take any measures to ensure that privileged and private information would not be revealed.
4. Some examples of sensitive information contained in these materials include credit card and bank statements, account invoices, billing numbers for cases unrelated to the CRT case, attorney notations on these documents, and a myriad of invoices that have not been redacted. It would be extremely time-consuming and inefficient to perform this redaction at this point.
5. The expenses have been thoroughly vetted. Opening these expense backup materials would begin an unnecessary and unproductive fishing expedition by objectors looking to nitpick individual expense items, and lead to prolonged collateral proceedings.
6. My firm, along with the audit committee, has spent a tremendous amount of time reviewing the backup documentation in excruciating detail to ensure a proper submission. In fact, although the amount of time we put into this audit was worthwhile, I believe it exceeds what has been required in most any other case of this kind. To continue this process by opening these materials up for additional scrutiny is not in the interest of judicial economy and I fear would be a waste of everybody's time and resources.

When balancing any potential advantages of disclosing these materials, the above concerns weigh heavily in favor of keeping this information confidential. I fully appreciate and understand the need to be transparent and our submission

to you was intended to be just that. However, I firmly believe that disclosing these materials is not the best course of action.

If there is anything I can do to ensure that you are more comfortable with the audit process, please do not hesitate to contact me. I would also be willing to set up a call with other members of the audit committee so that they could explain to you first-hand their work in auditing these expenses.

Sincerely,

Mario Alioto

Lauren C. Capurro (Russell)  
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**From:** MARTIN QUINN [mailto:[mq1942@me.com](mailto:mq1942@me.com)]  
**Sent:** Friday, January 08, 2016 11:04 AM  
**To:** Lauren Capurro (Russell)  
**Cc:** Marlo Cohen; Sandra Chan; Mario Alioto  
**Subject:** Re: CRT/Expense Audit Report

Dear Counsel: Is there any reason why these audit results and copies of the backup materials should not be filed on Case Anywhere? I want to keep this as transparent as possible, and I do not see anything confidential in my quick review of the material.

Martin Quinn  
Special Master

MARTIN QUINN  
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On Jan 7, 2016, at 6:10 PM, Lauren Capurro (Russell) <[LaurenRussell@tntp.com](mailto:LaurenRussell@tntp.com)> wrote:

Dear Special Master Martin Quinn:

Attached please find a letter from Mario N. Alioto regarding the expense audit.

As I informed Ms. Chan in my voicemail this afternoon, we are sending you the Dropbox link separately to ensure security. The Dropbox will also be password protected. I will send the password separately also. The Dropbox contains the following:

1. Exhibit 1 – Summary of the Audit Results;
2. Exhibit 2 – Detail of Disallowed Expenses; and
3. Copies of receipts and other backup materials received from the IPP firms.

Please do not hesitate to contact us if you have any questions.

Best regards,

Lauren

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<Letter Special Master Quinn 1.7.16.pdf>